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Solutia Inc.
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September 10, 2001
(Via certified or express mail)

Kevin Turner-Environmental Scientist, OSC
U. S. Environmental Protection Agency
c/o Crab Orchard National Wildlife Refuge
8588 Rt. 148
Marion, IL 62959


Thomas Martin
Associate Regional Counsel
77 West Jackson Boulevard (C-14J)
Chicago, IL 60604-3590

**Re: Sauget Sites Area I - May 31, 2000 Unilateral Administrative Order (UAO)
Sediment / Soils Removal Action**
• # 4 - September 2001 Monthly Report

Dear Mr. Turner and Mr. Martin,

Enclosed is the September 2001 Monthly Report for the Sauget Sites Area I May 31, 2000 Unilateral Administrative Order ("UAO") sediment removal Action. This submittal is in fulfillment of the monthly reporting requirements of the UAO, Section V, and paragraph 3.4. Reporting.

Sincerely,


D. M. Light
Manager, Remedial Projects
Solutia Inc.

cc:

Michael Ribordy - USEPA Region 5
Sauget File - Solutia
S. Bron - IEPA
Mayor D. Reed - Cahokia
Village of Sauget - % P. H. Weis & Associates (Attn: Brian Nelson)
Rich Bartelt - Arcadis

× Mike Henry - IDNR
× Kevin de la Bruere - USF&G
Mayor P. Sauget - Sauget, IL
Jon Dikinas - Dikinas Consulting

Sauget Sites Area I - Sauget, Illinois

May 31, 2000 UAO – Dead Creek Sediment Removal Action

Monthly Report

Date of Report: September 10, 2001
Period Covered: August 1, 2001 – August 31, 2001
Next Report Period: September 1, 2001 – September 30, 2001

Background

A Unilateral Administrative Order ("UAO") was issued to Solutia by the U. S. EPA on May 31, 2000, requiring construction of an on-site containment cell, removal of affected creek bed sediments and soils and flood plain soils from specific sections of Dead Creek, and placement of the affected sediments and soils in the newly constructed on-site cell. A Time Critical Removal Action Work Plan ("TCRAWP") was initially submitted to the Agencies June 30, 2000 for review and approval. Agreements sufficient to proceed with issuance of a request for bids for the containment cell construction were reached in December, 2000. Bids were received in late January and evaluated in February 2001.

Fieldwork began on the sediment de-watering phase of the project in November 2000. Installation of the required facilities (piping, pumps, basins, etc.) to de-water the sediments while the containment cell is being constructed was completed and started up in February, 2001. Operation of these facilities will continue until all sediments are placed into the containment cell.

Subject to the inclusion of all comments and agreed upon revisions, approval of the containment cell design by U. S. EPA was received March 5, 2001. A contract for construction of the containment cell was awarded March 8, 2001 to LMS Environmental Contracting, Inc. ("LMS").

A revised draft containment cell design was submitted to the Agencies March 30, 2001. This revised draft containment cell design incorporated all Agencies' comments and changes agreed to during the preceding discussion period. Placement of fill for the Containment Cell berms began April 23, 2001. The March 30, 2001 revised draft containment cell design (as further revised) was approved by the Agencies in a May 10, 2001 letter. Solutia agreed to continue to address remaining issues in good faith. On May 29, 2001, Solutia received from Kevin Turner IEPA's comments on the Sauget Area I TSCA Containment Cell Design. On July 9, 2001, Solutia submitted its Response to the Agencies' May 29, 2001 Comments on the Sauget Area I TSCA Containment Cell Design.

Agency Actions / Communications

- NONE

Work Performed during the reporting period

- Continued construction of the Containment Cell
 - Completed the primary and secondary liner installation in the Containment Cell;
 - Completed installation of access ramps into Cell;
 - Began backfilling anchor trenches.
- The Revision 01 Draft Groundwater Monitoring Plan was submitted to the Agencies August 3, 2001.
- The Operations and Maintenance Report was submitted for Agencies' review and approval August 28, 2001.
- Continued sediment dewatering activities and maintenance of dewatering pumps.
- Completed sediment removal from Rt 157 and Rt 3 box culverts.
- Began sediment removal from Segment E (Rt 157 heading north).
- Began relocating previously stockpiled sediment to Segment B.
- Completed construction of secondary containment pad for storm water storage and treatment system.
- Setup screening equipment in Segment B and began screening sediment.
- Began installation and development of cell groundwater monitoring wells.

Data Submittal

- There is no new data to submit

Work scheduled for next reporting period

- Complete cell construction pursuant to the approved design.
- Approval by the Agencies of the Containment Cell installation as consistent with the approved design.
- Begin placement of sediments into the approved Containment Cell structure.
- Complete installation and development of monitoring wells around TSCA cell. Collect first round of groundwater samples prior to the beginning of sediment placement into the Containment Cell.
- Continue screening sediments stockpiled in Segment B and begin placement into the bottom and sides of the Containment Cell.

PROJECT COMPLETION

Mobilization	100 %
Berm Construction	100 %
Liner Installation	95 %
Sediment Removal Preparation	100 %
Sediment Excavation (Site M)	100 %
Creek Sediment Excavation	30 %
Cover Installation	0 %
Demobilization	0 %
Final Report Preparation	0 %

Problems and Solutions

Rains in August delayed installation of liner system by two weeks

Submittal Schedule Status

- See attached UAO schedule

Issues under review

Comments

- None

May 31 Sauget Area I UAO Sediment Removal Action

SCHEDULE

Deliverable	Description	Due Date
Issuance Date	Date UAO signed by Muno	31-May-00
Effective Date	10 business day after issuance	14-Jun-00
Notice of Intent to Comply	3 business days after effective date	19-Jun-00
Designation of Contractor and Project Coordinator	5 business days after effective date	21-Jun-00
Access	14 calendar days after effective date	28-Jun-00
Time Critical Removal Action Work Plan Submittal	15 business days after effective date	7-Jul-00
EPA Approval of TCRA W/P		May 10, 2001
Monthly Reports	Begin 30 calendar days after approval of TCRA W/P until completion	June 10, 2001
Final Report	60 Calendar days after completion of sediments and soils removal	
Mitigation Plan	60 Calendar days after completion of sediments and soils removal	